

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
(WESTERN DIVISION)**

IN RE MERCY HEALTH ERISA LITIGATION

Civil Action No.: 1:16-cv-00441-SJD

**JOINT DECLARATION OF LAURA R. GERBER, MICHELLE C. YAU AND  
THOMAS R. THEADO IN SUPPORT OF PLAINTIFFS' MOTIONS FOR FINAL  
APPROVAL OF A CLASS ACTION SETTLEMENT AND FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES AND CASE CONTRIBUTION AWARDS**

**EXHIBIT D  
COHEN MILSTEIN SELLERS & TOLL PLLC  
ANALYSIS OF TIME, LODESTAR & EXPENSES**

*In re: Mercy Health ERISA Litigation*, No. 1:16-cv-00441-SJD-SKB (S.D. Ohio)

REPORTING PERIOD: Inception – October 10, 2018

Timekeeper	Initial Compl.	23(g)	Discovery	Amended Compl.	MTD	Misc. Motions/ scheduling	Mediation / Settlement	Prelim. Approval	Client Contact	Other Class Member	Final Approval	
Karen Handorf	0	9.75	0	8.75	3.5	1.25	0	0.25	0	0	0	<b>23.5</b>
Scott Lempert	1	53.50	7.25	10.5	0	23.5	0.75	7.75	0	0	2.5	<b>106.75</b>
Julie Selesnick	0	22.25	0	0	0	8.25	0	0	0	0.25	0	<b>30.75</b>
Michelle Yau	7.5	59.00	4	14.75	0	14	7	2	0	0.5	0	<b>108.75</b>
Robyn Swanson	5	2.00	2.5	12	0	3	0	0	0	0	0	<b>24.5</b>
Mary Bortscheller	0	0.00	0	0	0	0	0.25	0.75	0	0	0	<b>1</b>
Julia Horwitz	0	7.00	0	0	0	2	0	0	0	0.25	0	<b>9.25</b>
Kira Hettinger	0	0.00	0	0	0	0	0	0	0	0.75	0	<b>0.75</b>
Jamie Bowers	0	51.00	0	0	0	12.5	0	0	0	1.75	2.25	<b>67.5</b>
Connor Grant-Knight	0	22.25	0	0	0	0.25	0	12	0	4.5	0	<b>39</b>
Ryan Liddell	0	5.50	0	7.5	0	8	0	0	0	0	0	<b>21</b>
Maria Dewees	1.5	3.25	0	0	0	3.25	0	0	0	0	0	<b>8</b>
Regina Gail	0	0.00	0	0	0	0.75	0	0	0	0	0	<b>0.75</b>
Kate Tenenbaum	0	0.00	0	0	0	0	0	0	0	0.25	0	<b>0.25</b>
James Clark	0	1.00	0	3	0	0	0	0	0	0	0	<b>4</b>
Dirk Hamel	0	0.00	0	0	0	0	0	2.5	0	0	0	<b>2.5</b>
Tamara Haynes	0	0.00	0	0	0	0	0	0.25	0	0	0	<b>0.25</b>
<b>Totals</b>	<b>15</b>	<b>236.50</b>	<b>13.75</b>	<b>56.5</b>	<b>3.5</b>	<b>76.75</b>	<b>8</b>	<b>25.5</b>	<b>0</b>	<b>8.25</b>	<b>4.75</b>	<b>448.5</b>

<b>Timekeeper</b>	<b>Position</b>	<b>Year Admitted</b>	<b>Years in Practice</b>	<b>Reasonable Hourly Rate</b>	<b>Hours Inception – October 10, 2018</b>	<b>Total Fees</b>
<b>Attorneys:</b>						
Handorf, Karen, L.	Partner	1975	43	\$910	23.50	\$21,385.00
Lempert, Scott	Of Counsel	1995	23	\$730	106.75	\$77,927.50
Selesnick, Julie (Contract Attorney)	Attorney	2001	17	\$395	30.75	\$12,146.25
Yau, Michelle, C.	Partner	2004	14	\$690	108.75	\$75,037.50
Swanson, Robyn	Associate	2005	13	\$555	24.50	\$13,597.50
Bortscheller, Mary, J.	Associate	2010	8	\$555	1.00	\$555.00
Horwitz, Julia	Associate	2012	6	\$505	9.25	\$4,671.25
Hettinger, Kira	Associate	2013	5	\$445	0.75	\$333.75
Bowers, Jamie	Associate	2014	4	\$465	67.50	\$31,387.50
Subtotal:					372.75	\$237,041.25
<b>Professionals:</b>						
Grant-Knight, Connor	Paralegal			\$290	39.00	\$11,310.00
Liddell, Ryan	Paralegal			\$290	21.00	\$6,090.00
Deweese, Maria	Paralegal			\$270	8.00	\$2,160.00
Regina, Gail, D.	Paralegal			\$300	0.75	\$225.00
Tenenbaum, Kate	Paralegal			\$270	0.25	\$67.50
Clark, James	Paralegal			\$270	4.00	\$1,080.00
Hamel, Dirk	Paralegal			\$290	2.50	\$725.00
Haynes, Tamara	Paralegal			\$290	.25	\$72.50
Subtotal:					75.75	\$21,730.00
<b>TOTAL FEES:</b>						<b>\$258,771.25</b>

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**Cohen Milstein Sellers & Toll PLLC - Expenses**

<b>Description of Expense</b>	<b>Total Expenses</b>
Telephone/Facsimile	\$24.27
Postage/Express Delivery	\$54.27
Court Costs	\$985.00
Computer Research	\$2,387.02
Travel (Airfare, ground travel, meals, lodging)	\$28.55
<b>TOTAL EXPENSES:</b>	<b>\$3,479.11</b>